

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 05-_____
v.	:	DATE FILED: _____
ROBERT LISZEWSKI	:	VIOLATIONS:
		18 U.S.C. § 1344 (bank fraud - 3 counts)
	:	18 U.S.C. § 1028 (identity theft - 4 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 57282.
2. From on or about March 26, 2004, to on or about April 2, 2004, in the Eastern District of Pennsylvania, defendant

ROBERT LISZEWSKI

knowingly executed and attempted to execute a scheme to defraud Citizens Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant ROBERT LISZEWSKI pretended to be a Citizens Bank account holder in order to cash stolen, counterfeit, and otherwise unauthorized checks at Citizens Bank and to make unauthorized withdrawals from Citizens Bank.

4. From on or about March 26, 2004, to on or about April 2, 2004, defendant ROBERT LISZEWSKI presented 14 unauthorized checks and 2 unauthorized withdrawal slips at Citizens Bank. When cashing these checks and making these withdrawals, defendant LISZEWSKI pretended to be two different Citizens Bank account holders and forged their signatures on the checks and deposit/withdrawal slips.

5. Defendant ROBERT LISZEWSKI obtained fake Pennsylvania driver's licenses that identified him as the Citizens Bank account holder that he pretended to be at that time. Defendant LISZEWSKI presented these fraudulent identifications when attempting to get his transactions processed.

6. By cashing checks and making withdrawals in other people's names, defendant ROBERT LISZEWSKI stole and attempted to steal approximately \$53,048.18 from Citizens Bank.

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 33869.

2. On or about January 28, 2004, in the Eastern District of Pennsylvania, defendant

ROBERT LISZEWSKI

knowingly executed and attempted to execute a scheme to defraud Wachovia Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant ROBERT LISZEWSKI pretended to be a Wachovia Bank account holder in order to cash stolen, counterfeit, and otherwise unauthorized checks at Wachovia Bank and to make unauthorized withdrawals from Wachovia Bank.

4. On or about January 28, 2004, defendant ROBERT LISZEWSKI presented two unauthorized withdrawal slips/counter checks at Wachovia Bank. When cashing these checks and making these withdrawals, defendant LISZEWSKI pretended to be a Wachovia Bank account holder and forged that customer's signature on the checks and withdrawal slip.

5. Defendant ROBERT LISZEWSKI obtained a fake Pennsylvania driver's license that identified him as the Wachovia Bank account holder that he pretended to be.

Defendant LISZEWSKI presented this fraudulent identification when attempting to get his transactions processed.

6. By cashing the checks and making the withdrawals in other people's names, defendant ROBERT LISZEWSKI stole and attempted to steal approximately \$8,000.00 from Wachovia Bank.

In violation of Title 18, United States Code, Section 1344.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Sovereign Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 29950-2.
2. From on or about November 28, 2003, to on or about December 1, 2003, in the Eastern District of Pennsylvania defendant

ROBERT LISZEWSKI

knowingly executed and attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant ROBERT LISZEWSKI pretended to be a Sovereign Bank account holder in order to cash stolen, counterfeit, and otherwise unauthorized checks at Sovereign Bank and to make unauthorized withdrawals from Sovereign Bank.
4. From on or about November 28, 2003, to on or about December 1, 2003, defendant ROBERT LISZEWSKI presented four unauthorized checks at Sovereign Bank. When cashing these checks, defendant LISZEWSKI pretended to be a Sovereign Bank account holder and forged that customer's signatures on the checks.
5. Defendant ROBERT LISZEWSKI obtained a fake Pennsylvania driver's license that identified him as the Sovereign Bank account holder that he pretended to be.

Defendant LISZEWSKI presented this fraudulent identifications when attempting to get his transactions processed.

6. By cashing the checks in another person's name, defendant ROBERT LISZEWSKI stole and attempted to steal approximately \$16,000.00 from Sovereign Bank.

In violation of Title 18, United States Code, Section 1344.

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about March 30, 2004 to on or about April 2, 2004, in West Chester, in the Eastern District of Pennsylvania, defendant

ROBERT LISZEWSKI

knowingly and without lawful authority used a means of identification of another person, that is, the name of Citizens Bank customer J.F., with the intent to commit a violation of federal law, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, and thereby affected interstate commerce.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(1)(D), and (c)(3)(A).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about November 28, 2004 to on or about December 1, 2004, in the Eastern District of Pennsylvania, defendant

ROBERT LISZEWSKI

knowingly and without lawful authority used a means of identification of another person, that is, the name of Sovereign Bank customer M.L. III, with the intent to commit a violation of federal law, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, and thereby affected interstate commerce.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(1)(D), and (c)(3)(A).

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about March 26, 2004 to on or about March 28, 2004, in West Chester, in the Eastern District of Pennsylvania, defendant

ROBERT LISZEWSKI

knowingly and without lawful authority used a means of identification of another person, that is, the name of the Citizens Bank customer B.M. with the intent to commit a violation of federal law, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, and thereby affected interstate commerce.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(1)(D), and (c)(3)(A).

COUNT SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about January 28, 2004, in Allentown, in the Eastern District of Pennsylvania, defendant

ROBERT LISZEWSKI

knowingly and without lawful authority used a means of identification of another person, that is, the name of the Wachovia Bank customer J.T., with the intent to commit a violation of federal law, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, and thereby affected interstate commerce.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(1)(D), and (c)(3)(A).

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**